UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

| UNITED STATES OF AMERICA | § |
|--------------------------|----------------------------|
| | § |
| v. | § Criminal No. 4:19-cr-254 |
| | § |
| CRAIG BEASON | § |

MOTION FOR CONTINUANCE OF FINAL PRETRIAL, MOTION TO SUPPRESS DEADLINE AND CHANGE OF PLEA DEADLINE

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS:

COMES NOW, Defendant **CRAIG BEASON**, by and through his undersigned attorney, files this his MOTION FOR CONTINUANCE OF, MOTION TO SUPPRESS DEADLINE and PRETRIAL would show unto the Court the following:

I.

PROCEDURAL HISTORY

On the 12th day of September 2020, the Defendant, Craig Beason was indicted in a one-count indictment alleging a violation of 21 U.S.C. § 841(a)(1) (Possession with the Intent to Distribution of methamphetamine). On or about September 12, 2019, Defendant Craig Beason appeared before United States Magistrate Judge Christine Nowak for an Arraignment on the instant indictment. The Pretrial Order relating to Pretrial Discovery and Inspection was filed on April 15, 2020. Mr. Beason has also been indictment in the following case 4:20CR47; 4:20CR48 & 4:20CR55 pending in Judge Sean Jordan's Court.

The undersigned has conferred with The Government on the issue of consolidating all these cases. An unopposed motion to transfer and consolidate will be filed in Judge Jordan's Court this week.

Counsel and the Government need additional time to continue to explore and negotiate a possible plea to avoid trials in each of Mr. Beason's cases. Counsel seeks an additional 45 days to accomplish this task.

Due to the reason outlined above, Defendant respectfully requests an additional 45 days for the deadline for filing any motions to suppress, change of plea deadline, and final pretrial conference date.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that the Court grant all relief requested herein.

Respectfully submitted,

/s/ Scott H. Palmer
Scott Palmer
Texas State Bar No. 00797196
15455 Dallas Parkway
Suite 540
Addison Tx, 75001

Attorney for Defendant

CERTIFICATE OF CONFERENCE

I hereby certify that on the 8th day of May 2020 I conferred with Assistance United States Attorney Glen Roque-Jackson who was unopposed to the filing of this motion and the relief sought.

/s/ Scott H. Palmer
Scott H. Palmer

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May 2020, a true and correct copy of the foregoing motion was sent by CM/ECF to:

Glen Roque-Jackson U.S. Attorney's Office EDTX 101 E Park Blvd Suite 500 Plano, TX 75074

> /s/ Scott H. Palmer Scott H. Palmer